

**DECLARATION OF CHRISTOPHER YOON**

My name is Christopher Yoon. I declare under penalty of perjury that the foregoing is true and correct.

1. I began working for Samsung Electronics America, Inc. (“Samsung”) on February 19, 2020, as a Senior Manager, Mobile Business Strategy. My title eventually changed to Senior Professional, Customer/Market Insights.
2. I am an evangelical Christian who began a public eponymous YouTube channel in 2020, wherein I frequently post videos discussing my Christian beliefs, interpreting current events as it relates to End Times Eschatology and eventually the second coming of Christ.
3. In January of 2021, Samsung’s VP of Mobile Business Strategy, Paul Kim, informed me that the company had become aware of my YouTube channel and that he wanted to speak with me about it. He informed me that HR and Legal would discuss matters in a separate meeting.
4. On January 15, 2021, I had a meeting with Senior Legal Counsel, Dan Berrios, and Head of Mobile HR Business Partner, Sandra Sanchez. They informed me that the company had conducted an audit of my personal YouTube channel, following “reports” that had been made, and required me to separate the channel from all things relating to Samsung. They also asked me take down a video or edit out a portion of it for which I had recorded myself sharing my testimony as it relates to the Gospel to my coworkers in a virtual meeting for which it was deemed appropriate at the time and for which my coworkers had no problems with.
5. Notably, I receive thousands of comments on my videos, from hundreds of thousands of subscribers. I removed dozens of comments, in order to comply with Samsung’s request.
6. In December of 2021, I received a religious exemption from Samsung’s COVID-19 vaccination requirement.

7. On February 11, 2022, I was asked by HP Business Partner, Lauren Brumley, to remove a viewer comment on my channel from February 21, 2021, in which I was referred to as a manager at Samsung. I was unable to locate the alleged comment, and notified Ms. Brumley of this.
8. I went so far as to perform a thorough sweep of my other videos, to ensure that I was not in violation of Samsung's request anywhere else. I found no other comments.
9. On November 5, 2022, someone by the name of "Howard Brown" sent out a mass email to Samsung's HR department, complaining of a video that I had posted.
10. I received my quarterly review one month later, in which I received positive accolades, and no concerns were expressed regarding my performance.
11. The same day, I was invited to a call with Ms. Brumley, and the new Head of Mobile HR Business Partner. I was forbidden from recording the meeting, as I was being fired for "violating Samsung's social media policy."
12. Understandably, I asked what the violation was, to which they would not provide specific details, except that people were able to connect me to Samsung through my LinkedIn profile.
13. Following my termination, I requested my personnel file, under the Illinois Personnel Record Review Act. None of the items produced, relating to my termination, had any connection to my employment at Samsung.
14. On May 26, 2023, I hired Rob Wiley, P.C. to send a demand to Samsung, offering to waive all claims in exchange for \$750,000.00. Exhibit A-1.
15. On June 2, 2023, I filed a charge of discrimination with the Texas Workforce Commission against Samsung. Exhibit A-2.
16. Around September 28<sup>th</sup>, 2023, I had EEOC mediation with Mediator Katherine Gonzales with Samsung, no agreement was reached. Samsung offered me around \$5000-\$10,000 that day.

After that for the next month and a half, Samsung and I went back and forth on numbers until we got to \$492,500.00.

17. I eventually dropped my offer of settlement down to \$492,500.00, to which Samsung counter-offered with \$20,000.00. I rejected this offer.

18. On November 30, 2023, I received my Right to Sue letter from the EEOC. Exhibit A-3.

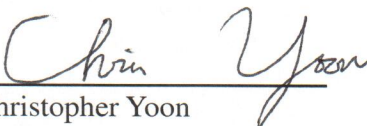
19. I am of the opinion that Samsung terminated me due to the expression of my religious beliefs, in direct violation of the Texas Labor Code and Title VII of the Civil Rights Act of 1964.

20. Samsung's actions were arbitrary and can be used to draw an inference of discrimination on the basis of my religion.

21. I have personal knowledge of and am record custodian for the following:

Exhibit A-1 – Demand to Samsung  
Exhibit A-2 – Charge of Discrimination  
Exhibit A-3 – Right to Sue Letter

Executed on the 28th day of February 2024.

  
Christopher Yoon